

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF MISSISSIPPI  
GREENVILLE DIVISION**

**BEVERLY KOVARCIK**

**PLAINTIFF**

**VS.**

**CAUSE NO. 4:23-cv-00106-SA-JMV**

**BAYOU ACADEMY**

**DEFENDANT**

**DEFENDANT SHAW EDUCATIONAL FOUNDATION (WRONGFULLY  
NAMED AND IMPROPERLY SERVED AS BAYOU ACADEMY)'S  
MOTION TO SUBMIT EXHIBITS UNDER SEAL**

**COMES NOW**, Shaw Educational Foundation (wrongfully named and improperly served as Bayou Academy who is appearing specially herein to contest the jurisdiction and causes of action asserted against it), by and through counsel of record and pursuant to the Federal Rules of Civil Procedure and hereby moves the Court for an Order granting the parties to file certain exhibits to its Answer to Plaintiff's Complaint. In support of said Motion, Defendant shows unto the Court the following:

1. In order to respond fully to the Plaintiff's Complaint, the Defendant has referred to and would attach certain exhibits to the Defendant's Answer.
2. That said exhibits are confidential, proprietary and/or involve certain subject matter that necessitates the submission of said exhibits under seal to preclude them from public viewing on the grounds that they would cause irreparable damage or injury to one or the other of the parties if they were disclosed publicly.
3. Counsel for the Parties have conferred regarding this matter and are in agreement regarding the relief sought herein.

**WHEREFORE**, Defendants request that the exhibits referenced in the Defendant's Answer be allowed to be filed under seal with the Court.

Respectfully submitted, this the 9<sup>th</sup> day of June, 2023.

SHAW EDUCATIONAL FOUNDATION,  
(wrongfully named and improperly served as  
Bayou Academy), Defendant

BY: /s/ C. Paige Herring  
**C. Paige Herring, Esq., One of  
Counsel of Record for said Defendant**

**OF COUNSEL:**

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**CERTIFICATE OF SERVICE**

I hereby certify that on this date, the foregoing document was electronically filed through the Court's MEC system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

This the 9<sup>th</sup> day of June, 2023.

/s/ C. Paige Herring  
C. PAIGE HERRING